

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA

Gregory C. Krug,

v.

No:

Victor Loranth, in his individual
capacity.

COMPLAINT

1) Krug is currently incarcerated in the Federal Bureau of Prisons'

Metropolitan Detention Center, which is located in Los Angeles, CA.

Clinical Director of

2) Loranth was employed as both a doctor at and the FCI Williams-

burg at all times which are relevant hereto, and he

now resides within Williamsburg County in South Carolina.

3) Jurisdiction is proper, pursuant to 28 USC §§ 1331 and 1332(a)(1),

and venue is proper, pursuant to 28 USC § 1391(b)(1).

4) This action has been brought under the authority of Bivens

v. Six Unknown Named Agents of the Federal Bureau of Narcotics,

403 US 388, because Loranth ~~what~~ was acting "under [the]

claim of federal authority" when he deliberately inflicted

cruel and unusual punishment upon Krug by not only

failing to treat the cirrhosis of his liver - despite

the disclosure of that condition in the medical records

which his employer had in its possession - but also by
to him,

issuing aspirin, despite the "precaution" which any

idiot can see in the Physicians' Desk Reference.

5) On 3/29/11, Loranth authorized the initial issuance of a

proscription for the daily injection of 81 mg. of aspirin -

despite the fact that, on 3/28, he had co-signed a

report which had been prepared on 3/25 by a RN named Mary Birchler that noted the existence of the cirrhosis of Krug's liver and described his skin color as "yellow," which indicates the presence of excess bilirubin and hence cirrhosis.

6) As indicated on Exhibit "A" hereto, on 4/11/11, Loranth signed a "Final Report" which stated that Krug's "Total Bilirubin" level was 2.3^{*} and that the maximum "Reference Range" therefor was 1.3. The facts that another ~~and~~ ^{the} abbreviation for "High" appears next thereto, and Krug's Total Bilirubin level was 80 percent greater than the maximum Reference Range did not cause Loranth to do anything.

* As can be seen in Exhibit "B" hereto, the cirrhosis of Krug's liver had decreased by 12 percent since 9/19/09 ($2.6 - 2.3 \div 2.6$).

(EXHIBIT "C")

7) Shortly after 6/10/11, Loranth received a letter from the Lake City Community Hospital which informed him that Krug suffered from "Cirrhosis [of his liver] with sequelae / portal venous hypertension." The fact that Loranth's receipt of that letter did not cause him to do anything is conclusive evidence as to his deliberate indifference of Krug's medical condition. The most probable reason why Loranth did not disclose the condition of Krug's liver to Krug is that he knew that Krug would demand to be seen by the appropriate specialist (a hepatologist), which would cause his employer to spend money that could be used for purposes which are more important than the medical care of of any inmate.

8) As can be seen on Exhibit "D" hereto, Krug's Bilirubin

Level had increased to 3.8 by 4/15/13, and the only pos-

sible explanation for that 65 percent^{*} increase is Loranthis

3/29/11 decision to issue aspirin to a known^{*} cirrhotic, for-

8 according to page 2 of Webmd.com's dissertation on cirrhosis-

Loranth's decision was "dangerous."

9) Krug was completely ignorant as to each of these facts until

he received Exhibit "D" about one month after 5/14/14, 13,

and hence this litigation has been timely initiated.

10) If the Court will permit Krug to depose Loranthis, he will be

able to prove that Loranthis is deliberately indifferent to

* $3.8 - 2.3 \div 2.3$

every inmate's need for medical services.

11) As Loranth will readily admit, there is no treatment - much less a cure - for the damage which he has deliberately inflicted upon Krug, and while it's not currently possible to accurately determine the extent to which Krug's life has been shortened by Loranth's deliberate indifference to the health of Krug's liver, it's very probable that his death will occur at least one year earlier as a result of Loranth's ^{herchy} misconduct, for which Krug seeks \$1,000,000 of actual damages and \$10,000,000 of punitive damages.

12) Krug herchy requests that this litigation be resolved by a jury.

Respectfully submitted,

 4-29-14

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